

Message

From: Richard S. Davis [RDavis@bdlaw.com]
Sent: 9/17/2020 7:17:27 PM
To: Bunch, Howard [Bunch.Howard@epa.gov]; Acord, Angela [Acord.Angela@epa.gov]
CC: Hilary T. Jacobs [HJacobs@bdlaw.com]; Richard S. Davis [RDavis@bdlaw.com]
Subject: Denali Response to Section 308 Information Request

Howard and Angela,

Subject to the inability to retrieve or review physical records directly owing to the COVID-19 pandemic, and subject to streamlining of Requests 5, 7, 8, we propose the following schedule for production in response to the Section 308 Information Request dated August 21, 2020.

- November 23, 2020: Request Numbers 1, 3, 6, 7, 8, 9, 12, 13
- January 29, 2021: Request Numbers 4, 5, 10, 11, 14, 15, 17, 18

Request Number 2 (the individual providing information) will be provided on in the same response in which another request is answered. A response to Request Number 16 was provided by counsel on September 3, 2020.

We look forward to discussing this proposed schedule and the streamlining that make it possible during our call later today. We will memorialize a formal request for an extension of the original 30-day response deadline for your consideration following our call.

Regards,

Richard

Richard S. Davis
Principal



1350 I Street, NW, Suite 700 ~ Washington, DC 20005 ~ bdlaw.com
O +1.202.789.6025 ~ M +1.301.775.7453 ~ RDavis@bdlaw.com

CONFIDENTIALITY STATEMENT: This electronic message contains information from the law firm of Beveridge & Diamond, P.C. and may be confidential or privileged. The information is intended solely for the use of the individual(s) or entity(ies) named above. If you are not the intended recipient, be aware that any disclosure, copying, distribution, or use of the contents of this message is prohibited. If you have received this e-mail in error, please notify us immediately by telephone at +1.202.789.6000 or by e-mail reply and delete this message. Thank you.